

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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 DR. DOUGLAS SCHOTTENSTEIN, M.D.,
 THOMPSON REAL ESTATE, LLC, and
 SCHOTTENSTEIN PAIN AND NEURO, PLLC D/B/A
 NY SPINE MEDICINE,

Plaintiffs,

-against-

DEREK LEE, PEARL CHAN and JOHN AND JANE
 DOES 1-10,

Defendants.

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DEFENSE EXHIBIT LISTIndex No.: **22-cv-01197 (DLC)****Defendants' List of Exhibits Expected to be Offered in their Defense**

(* = no objection as to authenticity; ** = no objection on any ground)

Exhibit Number	Description	*	**
DX-1	January 10, 2017 email from Cara Camden stating Douglas Schottenstein wants Pearl Chan added to his Citibank account		**
DX-2	January 23, 2017 email from Pearl Chan confirming a wire transfer from Douglas Schottenstein's Chase business checking account to Thompson Real Estate's checking account		**
DX-3	Affidavit of Jason Aaron McCollough of UnitedLex authenticating forensic extraction process of Derek Lee and Pearl Chan's phones	*	
DX-4	Affidavit of Matthew Dwight Buser of UnitedLex authenticating redaction of reports generated from Derek Lee and Pearl Chan's phones	*	
DX-5	September 22, 2017 text conversation between Douglas Schottenstein and Derek Lee including discriminatory abuse - Lines 41248-41260 of LOJC-SCHO-00000001	*	
DX-6	May 11, 2018 text conversation between Douglas Schottenstein and Derek Lee about Schottenstein's Airbnb plans - Lines 47092-47140 of LOJC-SCHO-00000001	*	
DX-7	May 26, 2018 text message from Douglas Schottenstein to Derek Lee and Pearl Chan telling Derek to check his email - Line 22854 of LOJC-SCHO-00000001	*	
DX-8	June 2-3, 2018 text conversation between Douglas Schottenstein, Derek Lee, Pearl Chan, and Janny Chong about Heisel, + full text of line 22860 - Lines 22860-22985 (except redacted lines) of LOJC-SCHO-00000001	*	

DX-9	June 18, 2018 text conversation between Douglas Schottenstein, Derek Lee, and Pearl Chan about chocolates - lines 9361-9367 of LOJC-SCHO-00000001 - contains Opposition to Summary Judgment Exhibit M	*	
DX-10	June 19, 2018 text conversation between Douglas Schottenstein and Derek Lee about Airbnb - lines 47663-47685 of LOJC-SCHO-00000001	*	
DX-11	June 24, 2018 text conversation between Douglas Schottenstein, Derek Lee, and Pearl Chan containing discriminatory threats and abuse - lines 10420-10528 of LOJC-SCHO-00000001	*	
DX-12	August 21, 2018 text conversation between Douglas Schottenstein and Derek Lee containing threats and abuse - lines 48000-48064 of LOJC-SCHO-00000001	*	
DX-13	September 16, 2018 text conversation between Douglas Schottenstein and Derek Lee containing threats and abuse - lines 48820-48877 of LOJC-SCHO-00000001	*	
DX-14	October 31, 2018 text message from Douglas Schottenstein to Derek Lee about his 2019 salary - line 17168 of LOJC-SCHO-00000001	*	
DX-15	October 31, 2018 text conversation between Douglas Schottenstein, Derek Lee, and Pearl Chan about their salaries, including threats and abuse - line 17302-17450 of LOJC-SCHO-00000001 - contains Opposition to Summary Judgment Exhibit G	*	
DX-16	November 4, 2018 text conversation between Douglas Schottenstein, Derek Lee, and Pearl Chan about their salaries - lines 17560-17642 of LOJC-SCHO-00000001 - contains Opposition to Summary Judgment Exhibit F	*	
DX-17	July 1, 2019 text conversation between Douglas Schottenstein and Pearl Chan about not paying her - lines 3898-3915 of LOJC-SCHO-00003676	*	
DX-18	July 6, 2019 text conversation between Douglas Schottenstein and Pearl Chan about mortgage - lines 5458-5465 of LOJC-SCHO-00003676		
DX-19	July 12, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 6743-6745 of LOJC-SCHO-00003676		
DX-20	July 20, 2019 text conversation between Douglas Schottenstein and Pearl Chan containing discriminatory abuse - lines 8061-8225 of LOJC-SCHO-00003676	*	
DX-21	July 22, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 8735-8749 of LOJC-SCHO-00003676		
DX-22	July 23, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 9512-9549 of LOJC-SCHO-00003676		

DX-23	July 25, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 10214-10226 of LOJC-SCHO-00003676		
DX-24	July 26, 2019 text conversation between Douglas Schottenstein and Pearl Chan including discriminatory abuse - lines 10361-10402 of LOJC-SCHO-00003676	*	
DX-25	July 26, 2019 text conversation between Douglas Schottenstein and Pearl Chan about Schottenstein getting a gun - lines 10788-10809 of LOJC-SCHO-00003676	*	
DX-26	July 27, 2019 semi-nude picture sent from Douglas Schottenstein to Pearl Chan - line 11132 of LOJC-SCHO-00003676		
DX-27	July 29, 2019 text conversation between Douglas Schottenstein and Pearl Chan about “weed oil” - lines 12234-12236 of LOJC-SCHO-00003676	*	
DX-28	July 31, 2019 text message from Douglas Schottenstein to Pearl Chan about pay - line 13404 of LOJC-SCHO-00003676		
DX-29	August 3, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 14561-14570 of LOJC-SCHO-00003676		
DX-30	August 8, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex, including abuse, + full text of line 15312 - lines 15307-15365 of LOJC-SCHO-00003676	*	
DX-31	August 19, 2019 text conversation between Douglas Schottenstein and Pearl Chan containing discriminatory abuse - lines 16921-16925 of LOJC-SCHO-00003676	*	
DX-32	August 26, 2019 text message from Douglas Schottenstein to Pearl Chan containing discriminatory abuse - line 17971 of LOJC-SCHO-00003676	*	
DX-33	August 26, 2019 text message from Douglas Schottenstein to Pearl Chan containing threats and abuse - line 18244 of LOJC-SCHO-00003676	*	
DX-34	August 26, 2019 text message from Douglas Schottenstein to Pearl Chan containing threats, abuse, and reference to salary - lines 18273-18274 of LOJC-SCHO-00003676	*	
DX-35	August 26, 2019 text message from Douglas Schottenstein to Pearl Chan containing discriminatory abuse - line 18306 of LOJC-SCHO-00003676	*	
DX-36	August 26, 2019 text conversation between Douglas Schottenstein and Pearl Chan about reimbursement for business expenses - lines 18452-18483 of LOJC-SCHO-00003676	*	
DX-37	August 26, 2019 text message from Douglas Schottenstein to Pearl Chan stating if he owed her, he would pay her - line 18620 of LOJC-SCHO-00003676		

DX-38	August 27, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 19212-19213 of LOJC-SCHO-00003676		
DX-39	August 28, 2019 text conversation between Douglas Schottenstein, Pearl Chan, “Maria Q,” and “Martha Y” about laundry, including threats and abuse - lines 2283-2322 of LOJC-SCHO-00003676	*	
DX-40	August 28, 2019 text conversation between Douglas Schottenstein and Pearl Chan containing discriminatory abuse - lines 19845-19850 of LOJC-SCHO000003676	*	
DX-41	September 2, 2019 text message from Douglas Schottenstein to Pearl Chan containing discriminatory abuse - line 21083 of LOJC-SCHO-00003676	*	
DX-42	September 4, 2019 picture sent from Douglas Schottenstein to Pearl Chan - line 21922 of LOJC-SCHO-00003676		
DX-43	September 6, 2019 picture sent from Douglas Schottenstein to Pearl Chan - line 22192 of LOJC-SCHO-00003676		
DX-44	September 27, 2019 text conversation between Douglas Schottenstein and Pearl Chan about “chocolates” and marijuana - lines 25792-25800 of LOJC-SCHO-00003676	*	
DX-45	October 14, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 1698-1699 of LOJC-SCHO-00003676		
DX-46	October 22, 2019 text conversation between Douglas Schottenstein and Pearl Chan threatening to not pay her, then partially retracting threats - lines 29428-29507 of LOJC-SCHO-00003676	*	
DX-47	November 2-3, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 31270-31284 of LOJC-SCHO-00003676		
DX-48	November 8, 2019 picture sent by Douglas Schottenstein to Pearl Chan - line 31930 of LOJC-SCHO-00003676		
DX-49	November 17, 2019 text conversation between Douglas Schottenstein and Pearl Chan about cash withdrawals and containing abuse - lines 32880-32985 of LOJC-SCHO-00003676 - contains Opposition to Summary Judgment Exhibit J	*	
DX-50	November 24, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 33569-33571 of LOJC-SCHO-00003676		
DX-51	November 27, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex, “weed pills” - lines 34281-34298 of LOJC-SCHO-00003676	*	
DX-52	November 29, 2019 text conversation between Douglas Schottenstein and Pearl Chan containing marijuana reference - lines 34359-34360 of LOJC-SCHO-00003676	*	
DX-53	December 6, 2019 text conversation between Douglas Schottenstein and Pearl Chan about pay and containing threats and abuse - lines 35090-35134 of LOJC-SCHO-00003676	*	

DX-54	December 19, 2019 text conversation between Douglas Schottenstein and Pearl Chan about pay and containing threats and discriminatory abuse - lines 36525-36602 of LOJC-SCHO-00003676	*	
DX-55	December 26, 2019 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 37238-37241 of LOJC-SCHO-00003676		
DX-56	January 8, 2020 text conversation between Douglas Schottenstein and Pearl Chan, including threats and abuse lines 38226-38248 of LOJC-SCHO-00003676	*	
DX-57	January 19, 2020 text conversation between Douglas Schottenstein and Pearl Chan about flights - lines 38736-38739 of LOJC-SCHO-00003676	*	
DX-58	January 29, 2020 text conversation between Douglas Schottenstein and Pearl Chan containing discriminatory abuse and statement about pay - lines 39351-39363 of LOJC-SCHO-00003676	*	
DX-59	February 3, 2020 picture sent by Douglas Schottenstein to Pearl Chan - line 40304 of LOJC-SCHO-00003676		
DX-60	February 6, 2020 email from Douglas Schottenstein to Rruffin@msgsb.com - Opposition to Summary Judgment Exhibit K	*	
DX-61	February 10, 2020 email from Douglas Schottenstein to Rruffin@msgsb.com	*	
DX-62	February 28, 2020 text conversation between Douglas Schottenstein and Pearl Chan containing discriminatory abuse - Lines 42358-42375 of LOJC-SCHO-00003676	*	
DX-63	March 23, 2020 text conversation between Douglas Schottenstein and Pearl Chan about using Amex - lines 44433-44437 of LOJC-SCHO-00003676		
DX-64	March 30, 2020 text conversation between Douglas Schottenstein and Pearl Chan about Amex and other account balances - lines 45004-45014 of LOJC-SCHO-00003676		
DX-65	April 12, 2020 text conversation between Douglas Schottenstein and Pearl Chan about Chase, Amex, and Pearl ordering food for him, including pictures of Schottenstein's Chase card - lines 46733-46757 of LOJC-SCHO-00003676	*	
DX-66	April 22, 2020 text conversation between Douglas Schottenstein and Pearl Chan about "weed pills" - lines 47573-47575 of LOJC-SCHO-00003676	*	
DX-67	April 26, 2020 text conversation between Douglas Schottenstein and Pearl Chan about Gibraltar account balance - lines 48118-48145 of LOJC-SCHO-00003676	*	
DX-68	May 12, 2020 text conversation between Douglas Schottenstein and Pearl Chan containing threats and abuse - lines 105-690 of LOJC-SCHO-00003676	*	
DX-69	May 14, 2020 text conversation between Douglas Schottenstein and Pearl Chan about cannabis edibles - lines 49258-49264 of LOJC-SCHO-00003676	*	

DX-70	May 15, 2020 text conversation between Douglas Schottenstein and Pearl Chan about Chase account - lines 49327-49328 of LOJC-SCHO-00003676	*	
DX-71	May 19, 2020 text conversation between Douglas Schottenstein and Pearl Chan about “weed pills” - lines 49586-49588 of LOJC-SCHO-00003676	*	
DX-72	May 19, 2020 text conversation between Douglas Schottenstein and Pearl Chan about weed vials, including picture of Douglas Schottenstein using a marijuana vape pen - lines 49636-49642 of LOJC-SCHO-00003676	*	
DX-73	June 25, 2020 picture sent from Douglas Schottenstein to Pearl Chan - line 51691 of LOJC-SCHO-00003676		
DX-74	June 26, 2020 picture sent from Douglas Schottenstein to Pearl Chan - line 51828 of LOJC-SCHO-00003676		
DX-75	July 2, 2020 picture sent from Douglas Schottenstein to Pearl Chan - line 52178 of LOJC-SCHO-00003676		
DX-76	July 3, 2020 text conversation between Douglas Schottenstein and Pearl Chan about checking Amex - line 52213 of LOJC-SCHO-00003676		
DX-77	July 9, 2020 text conversation between Douglas Schottenstein and Pearl Chan about “weed pills” and picture sent by Schottenstein to Pearl Chan - lines 52443-52449 of LOJC-SCHO-00003676	*	
DX-78	August 20, 2020 text conversation between Douglas Schottenstein and Pearl Chan about Amex - lines 54518-54521 of LOJC-SCHO-00003676		
DX-79	September 14, 2020 text conversation between Douglas Schottenstein and Pearl Chan about “weed pills” - lines 55851-55852 of LOJC-SCHO-00003676	*	
DX-80	October 2, 2020 text conversation between Douglas Schottenstein and Pearl Chan about “weed pills” of LOJC-SCHO-00003676 - lines 57783-57785 of LOJC-SCHO-00003676	*	
DX-81	October 2020 Chase bank statement showing payment of a HIPAA penalty by Derek Lee - DEF00229-00248 - Opposition to Summary Judgment Exhibit I		
DX-82	November 6, 2020 text conversation between Douglas Schottenstein and Pearl Chan about edibles - Lines 60541-60546 of LOJC-SCHO-00003676	*	
DX-83	Records from November 7, 2020 visit by Douglas Schottenstein’s Miniature Pinscher Ronny to BluePearl Emergency Pet Hospital - LOJC-SCHO-00003677-3757		
DX-84	November 7-8, 2020 text conversation between Douglas Schottenstein and Pearl Chan about Ronny’s hospitalization - Lines 60580-60735 of LOJC-SCHO-00003676	*	

DX-85	November 8, 2020 text conversation between Douglas Schottenstein and Pearl Chan about Ronny's hospitalization - Lines 60795-60806 of LOJC-SCHO-00003676	*	
DX-86	November 8, 2020 text conversation between Douglas Schottenstein and Pearl Chan about Ronny's hospitalization - Lines 60856-60876 of LOJC-SCHO-00003676	*	
DX-87	November 20, 2020 text conversation between Douglas Schottenstein and Pearl Chan about reimbursing Pearl - Lines 62431-62438 of LOJC-SCHO-00003676	*	
DX-88	November 25, 2020 complaint in SDNY case 20-cv-09961-AJN (Schottenstein v. ASPCA et al)		
DX-89	February 10, 2021 police report by Douglas Schottenstein	*	
DX-90	May 27, 2021 letter from Amanda Itzkoff, MD		

Dated: New York, NY
March 6, 2024

Respectfully submitted,

Andrew L. Hoffman

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